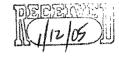
P.O. Box 284 Barton, VT 05822

www.immunact.com

December 17, 2004

Food and Drug Administration Center for Food Safety and Applied Nutrition Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-810) 5100 Paint Branch Parkway College Park, MD 20740



Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations. we hereby notify you that we are using the following statement(s):

(1) Name and address of distributor:

ImmunAct Inc., P.O. Box 284, Barton, VT 05822

(2) Statement:

"These friendly probiotics help to maintain a healthy digestive system."

(3) Name of the dietary ingredient(s) if not provided in the text of the statement:

Probiotic Bacteria 10 Billion Organisms:

L.acidophilus Rosell0052	26.6%	2.6 billion cells
L.rhamnosus Rosell0011	26.6%	2.6 billion cells
Bifidobacterium longum Rosell0175	26.6%	2.6 billion cells
Saccharomyces Boulardii (ATCC74012)	20.0%	2.0 billion cells

(4) Name of the dietary supplement(s):

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ImmunActTM Lactobacillus Acidophilus & Rhamnosus

(5) The following disclaimer appears on the label in bold:

> This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure of prevent any disease.

I certify that the information contained in this notice is complete and accurate, and that ImmunAct Inc. has substantiation that the statement is truthful and not misleading.

Respectfully submitted,

Roland A. Poirier

Co-Founder & President

ImmunAct Inc.

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